

October 12, 2000

Mr. Timothy B. Wall
New England Manager
CDM Federal Programs Corporation
One Cambridge Place
50 Hampshire Street
Cambridge, MA 02139

**Re: Ambient and Personal Air Monitoring, Potential Deregulated Zone,
Former Screening Facility, Libby, Montana**

Dear Mr. Wall,

PES proposes collecting ambient air samples on the northwestern portion of the screening plant property that is presently being covered with geotextile fabric and collecting additional personal air samples on the workers placing the geotextile fabric. The additional ambient air samples will be collected by PES as part of the ongoing air monitoring being conducted during the EPA's removal action of the former screening facility. The personal air samples will be collected through completion of the placement of the geotextile fabric. The purpose of these samples is to determine if the zone of the regulated area being covered by the geotextile fabric can be deregulated during back fill operations. The following paragraphs discuss the air sampling methodology that will be implemented in collecting these additional ambient air samples.

PES will collect four personal air samples on the workers placing the geotextile fabric. Two of the four personal air samples will be placed on workers that are nailing the geotextile fabric in place. These two workers shall be on the fabric at all times during their days' activities. The two remaining workers shall be unrolling and positioning the geotextile fabric in-place. This approach shall provide data for both types of activities during geotextile placement and show the air quality while work activities take place on the geotextile fabric.

PES will collect eight additional ambient air samples on the portion of the regulated area once covered with Geotextile Fabric. Four of the samples being collected shall be spaced equal distances apart along a line between the non-covered portion of the regulated area and the covered portion of the regulated area. The other four samples will be collected within the covered portion of the regulated area, spaced equal distances apart, along a line approximately 50 yards northwest of the first four samples. These eight samples will be collected as work continues on the non-covered portion of the regulated area.

If the results of these air samples indicate that airborne asbestos concentrations within the covered portion of the regulated area are below 0.007 structures per

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cubic centimeter (S/cc), then this portion of the regulated area will be deregulated during backfill operations. The perimeter of the regulated area will be moved to the edge of the Geotextile Fabric and PES will continue to monitor this as a new perimeter by collecting two additional perimeter air samples daily. PES will continue to collect the original west-end perimeter sample (location 6) to ensure that backfill operations do not generate elevated fiber levels that could migrate offsite.

All of the additional air samples will be collected and analyzed in accordance with the Removal Action Sampling and Analysis Plan, Confirmation Sampling of Soil and Air Perimeter and Personal Sampling of Air for Asbestos, Operable Unit 02, Former Screening Plant Area, Near Libby, Montana, dated August 2000.

If PES may be of further assistance or if you have any questions or comments about the air sampling methodology, please contact me directly at 703.471.8383.

Sincerely,

PACIFIC ENVIRONMENTAL SERVICES, INC.

A handwritten signature in black ink, appearing to read "B. Stewart", written over the company name.

Brian S. Stewart
Senior Project Manager

cc: Mr. Fred Babin (CDM)
Mr. John McGuiggin (Volpe)
Mr. Paul Kudarauskas (Volpe)
Mr. Jude Hobza (EPA)